

Exhibit B

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

NEXTGEAR CAPITAL, INC.,
an Indiana company,
Plaintiff,

v.

**JOHN YURKOVICH AUTO SALES,
INC.,** a Michigan company, and
JOHN YURKOVICH, individually,
Defendants.

Case No. 16-cv-10298

Hon. John Corbett O'Meara
Mag. Judge Mona K. Majzoub

AFFIDAVIT OF BRAD A. DANEK

STATE OF MICHIGAN)
)SS
COUNTY OF OAKLAND)

BRAD A. DANEK, being duly sworn, deposes and states as follows:

1. I am counsel for Plaintiff NextGear Capital, Inc. in the above-captioned lawsuit.

2. Plaintiff's Summons and Complaint were personally served on Defendant John Yurkovich on February 1, 2016, as reflected in the proof of service filed with this Court on February 2, 2016 [Dkt. 7].

3. The time in which Defendant may answer, appear, or otherwise respond as provided by the Federal Rules of Civil Procedure has expired, and no extension of such time has been requested by Defendant or granted by this Court.

4. Following the Default Entry by the Clerk filed in this case, Defendant has not filed an answer to the Complaint with this Court or otherwise defended this lawsuit.

5. As of the date of this Affidavit, Plaintiff has incurred \$12,188 in legal fees in this District Court litigation resulting from 40.10 hours of work by three attorneys with hourly rates from \$260 to \$480; \$15,752 resulting from 41.00 hours or work by two attorneys with hourly rates from \$260 to \$530; and \$581.85 in costs.

6. The fee detail reports attached hereto, demonstrating the work performed by counsel and the costs incurred, to my knowledge are true and accurate.

Further, affiant sayeth not.

/s/ Brad A. Danek
Brad A. Danek (P72098)

| Date | Received From/Paid To | Chq# | General | | Bld | Trust Activity | | | | |
|-------------|---|-------|---------|-------|---------|----------------|-------|------|-------|------------------|
| Entry # | Explanation | Rec# | Rcpt | Disbs | Fees | Inv# | Acc | Rcpt | Disbs | Balance |
| 200330 | NextGear Capital, Inc. | | | | | | | | | |
| 200330-0001 | John Yurkovich Auto Sales, Inc. | | | | | | | | | Resp Lawyer: DNS |
| Jan 15/2016 | Lawyer: DS 1.20 Hrs X 480.00 | | | | | | | | | |
| 314540 | reviewed several e-mails from S. Landreth; began reviewing documents for dispute - loan, guaranty, UCC, PMSIs, etc.; telephone conference with S. Landreth and B. Danek re factual background and case strategy | | | | 576.00 | 25835 | | | | |
| Jan 18/2016 | Lawyer: BD 4.40 Hrs X 260.00 | | | | | | | | | |
| 313869 | legal research for federal replevin cases and bond requirements; review initial documents from client; draft verified complaint; draft motion and affidavit | | | | 1144.00 | 25835 | | | | |
| Jan 18/2016 | Lawyer: DS 0.20 Hrs X 480.00 | | | | | | | | | |
| 314541 | reviewed B. Danek's draft Complaint and e-mail to S. Landreth re same | | | | 96.00 | 25835 | | | | |
| Jan 20/2016 | Lawyer: BD 3.20 Hrs X 260.00 | | | | | | | | | |
| 313867 | draft and revise verified complaint and motion to repossess collateral | | | | 832.00 | 25835 | | | | |
| Jan 20/2016 | Lawyer: DS 0.10 Hrs X 480.00 | | | | | | | | | |
| 314542 | reviewed e-mail correspondence from S. Landreth re units and updated facts; reviewed e-mail correspondence from B. Danek re same | | | | 48.00 | 25835 | | | | |
| Jan 21/2016 | Lawyer: BD 0.80 Hrs X 260.00 | | | | | | | | | |
| 313868 | revise and edit brief in support of motion for repossession and updated complaint with new outstanding balance | | | | 208.00 | 25835 | | | | |
| Jan 26/2016 | Lawyer: BD 2.00 Hrs X 260.00 | | | | | | | | | |
| 314320 | revise and edit Complaint and Motion for Possession; draft proposed order | | | | 520.00 | 25835 | | | | |
| Jan 27/2016 | Lawyer: BD 1.50 Hrs X 260.00 | | | | | | | | | |
| 314413 | revise and edit complaint, motion, and brief in support; draft temporary order | | | | 390.00 | 25835 | | | | |
| Jan 27/2016 | Lawyer: DS 0.80 Hrs X 480.00 | | | | | | | | | |
| 314577 | reviewed e-mail correspondence from S. Landreth and B. Danek; reviewed and revised B. Danek drafts of Complaint, Motion for Immediate Possession Pending Judgment, and Brief in Support | | | | 384.00 | 25835 | | | | |
| Jan 28/2016 | Lawyer: BD 1.30 Hrs X 260.00 | | | | | | | | | |
| 314946 | revise and edit final draft of complaint and filed with court | | | | 338.00 | 25835 | | | | |
| Jan 28/2016 | Expense Recovery | X9311 | | | | | | | | |
| 314986 | Case Filing Fee | | | | 400.00 | | 25835 | | | |
| Jan 28/2016 | Lawyer: DS 0.80 Hrs X 480.00 | | | | | | | | | |
| 315022 | reviewed e-mail correspondence from B. Danek and S. Landreth; reviewed electronic case filing notice and Complaint as filed; office conference with B. Danek re Judge O'Meara and strategy; drafted e-mail correspondence to S. Landreth re same; reviewed electronic case filing notice and Motion for Possession as filed | | | | 384.00 | 25835 | | | | |
| Jan 29/2016 | Lawyer: BD 0.20 Hrs X 260.00 | | | | | | | | | |
| 315224 | phone call with case management clerk regarding status; email to client with update | | | | 52.00 | 25835 | | | | |
| Jan 29/2016 | Lawyer: DS 0.10 Hrs X 480.00 | | | | | | | | | |
| 315227 | exchanged e-mail correspondence with B. Danek re status of Summons and Service; drafted e-mail correspondence to S. Landreth re same | | | | 48.00 | 25835 | | | | |
| Feb 1/2016 | Billing on Invoice 25835 | | | | | | | | | |
| 315829 | FEES 5020.00 | | | | 0.00 | | 25835 | | | |
| | DISBS 400.00 | | | | | | | | | |
| Feb 1/2016 | Lawyer: DS 0.30 Hrs X 480.00 | | | | | | | | | |
| 321951 | reviewed several electronic case filing notices (.1); reviewed two Summons issued and Notice to Parties of Consent of a Civil Action before a Magistrate Judge | | | | 144.00 | 260573 | | | | |

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|-----------------------|---|------|---------|-------|--------|------|----------------|-------|-------|---------|
| Entry # | Explanation | Rec# | Rcpt# | Disbs | Fees | Inv# | Acc | Rcpt# | Disbs | Balance |
| Feb 2/2016 321946 | Option (.1); reviewed e-mail correspondence from S. Landreth and bond (.1) Lawyer: BD 0.10 Hrs X 260.00 receipt and filed proofs of service from process server | | | | 26.00 | | 260573 | | | |
| Feb 2/2016 321947 | Lawyer: BD 0.10 Hrs X 260.00 phone call with case management clerk for hearing on motion to show cause | | | | 26.00 | | 260573 | | | |
| Feb 4/2016 324248 | Lawyer: DS 1.20 Hrs X 480.00 exchanged e-mail correspondence from S. Landreth re status (.1); telephone call to W. Barkholz, Judge O'Meara's clerk (.3); drafted e-mail correspondence to S. Landreth (.2); telephone conference with W. Barkholz (.3); telephone conference with J. Yurkovich (.4); reviewed the revised and executed Declaration of D. Edwards (.1) | | | | 576.00 | | 260573 | | | |
| Feb 5/2016 321962 | Lawyer: DS 1.80 Hrs X 480.00 telephone conference with W. Barkholz, Court's Deputy Clerk, re status (.1); drafted revisions to proposed Order Restricting Disposition and Show Cause (.4); telephone conference with J. Yurkovich re status and hearing (.4); drafted e-mail correspondence to W. Barkholz re same (.1); drafted e-mail correspondence to S. Landreth and B. Danek re same (.2); reviewed electronic case filing notice and reviewed Order restraining disposition of collateral pending hearing on Motion for possession of collateral pending final judgment and setting hearing (.3); drafted e-mail correspondence to S. Landreth and B. Danek re same (.1); exchanged e-mail correspondence with S. Landreth re hearing witness (.1); coordinated service of order on J. Yurkovich (.1) | | | | 864.00 | | 260573 | | | |
| Feb 8/2016 324249 | Lawyer: BD 0.10 Hrs X 260.00 reviewed notice of entry of counsel for Yurkovich | | | | 26.00 | | 260573 | | | |
| Feb 8/2016 324250 | Lawyer: BD 0.20 Hrs X 260.00 draft letter to Yurkovich re response to motion | | | | 52.00 | | 260573 | | | |
| Feb 9/2016 321952 | Lawyer: BD 0.10 Hrs X 260.00 participate in phone call from counsel for defendant | | | | 26.00 | | 260573 | | | |
| Feb 9/2016 321953 | Lawyer: BD 0.20 Hrs X 260.00 email to client with update and to request settlement options | | | | 52.00 | | 260573 | | | |
| Feb 9/2016 321963 | Lawyer: DS 0.40 Hrs X 480.00 telephone conference with opposing counsel D. Ienna and B. Danek (.2); telephone conference with Judge O'Meara's clerk W. Barkholz re same (.1); reviewed e-mail correspondence from B. Danek and S. Landreth (.1) | | | | 192.00 | | 260573 | | | |
| Feb 10/2016 321955 | Lawyer: BD 0.20 Hrs X 260.00 phone call with client to prepare for show cause hearing | | | | 52.00 | | 260573 | | | |
| Feb 10/2016 321956 | Lawyer: BD 1.10 Hrs X 260.00 review file contents to prepare for hearing | | | | 286.00 | | 260573 | | | |
| Feb 11/2016 318886 | Expense Recovery Local Ledes Travel 86 @ 0.575 X9369 | | | 49.45 | | | 260573 | | | |
| Feb 11/2016 318889 | Expense Recovery Local Ledes Travel 1 @ 2.40 X9369 | | | 2.40 | | | 260573 | | | |
| Feb 11/2016 319614 | Lawyer: DS 0.10 Hrs X 480.00 reviewed electronic case filing notice and court's docket entry re granting of motion | | | | 48.00 | | 260573 | | | |
| Feb 11/2016 321958 | Lawyer: BD 3.00 Hrs X 260.00 appear for hearing on motion to seize vehicles | | | | 780.00 | | 260573 | | | |
| Feb 11/2016 321959 | Lawyer: BD 0.80 Hrs X 260.00 revise and edit proposed order | | | | 208.00 | | 260573 | | | |

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|-------------|--|-------|---------------------|-------|----------------------------|------|-----|------|--------|---------|
| Entry # | Explanation | Rec# | Rcpt | Disbs | Fees | Inv# | Acc | Rcpt | Disbs | Balance |
| Feb 11/2016 | for seizure and sent to Defendant's counsel for approval | | | | | | | | | |
| 321964 | Lawyer: BD 0.20 Hrs X 260.00 email from defendant's counsel regarding settlement for 70k | | | | 52.00 | | | | 260573 | |
| Feb 11/2016 | Lawyer: BD 0.20 Hrs X 260.00 email and phone call with client to discuss settlement | | | | 52.00 | | | | 260573 | |
| 321966 | Lawyer: BD 0.20 Hrs X 260.00 receipt and analysis of updated receivable detail report for use in settlement negotiations | | | | 52.00 | | | | 260573 | |
| Feb 12/2016 | Lawyer: DS 0.10 Hrs X 480.00 reviewed electronic case filing notice and Order as entered | | | | 48.00 | | | | 260573 | |
| 319613 | Lawyer: BD 0.40 Hrs X 260.00 receipt and review settlement offer from JYAS | | | | 104.00 | | | | 260573 | |
| Feb 15/2016 | Lawyer: BD 0.40 Hrs X 260.00 review receivable report to determine amount past due | | | | 104.00 | | | | 260573 | |
| 321970 | Lawyer: BD 0.40 Hrs X 260.00 email to client regarding offer | | | | 52.00 | | | | 260573 | |
| Feb 15/2016 | Lawyer: JM 0.50 Hrs X 270.00 Research court's practice re seizures. | | | | 135.00 | | | | 260573 | |
| 324251 | Lawyer: JM 0.30 Hrs X 270.00 Communicate with US Marshal's Office and alternative court officers re same. | | | | 81.00 | | | | 260573 | |
| Feb 15/2016 | Lawyer: JM 0.20 Hrs X 270.00 Work with B. Danek re seizure of vehicles as collateral | | | | 54.00 | | | | 260573 | |
| 324252 | Lawyer: DS 0.10 Hrs X 480.00 reviewed e-mail correspondence from B. Danek and S. Landreth re arranging repossession | | | | 48.00 | | | | 260573 | |
| Feb 16/2016 | Lawyer: BD 0.20 Hrs X 260.00 receipt and review email from client with settlement terms | | | | 52.00 | | | | 260573 | |
| 317358 | Lawyer: BD 0.30 Hrs X 260.00 draft settlement offer to Defendant | | | | 78.00 | | | | 260573 | |
| Feb 16/2016 | Lawyer: JM 0.20 Hrs X 270.00 Call with US Marshal's Office re seizure. | | | | 54.00 | | | | 260573 | |
| 324253 | Lawyer: DS 0.20 Hrs X 480.00 office conference with B. Danek re status of repossession and settlement negotiations | | | | 96.00 | | | | 260573 | |
| Feb 17/2016 | Lawyer: JM 0.10 Hrs X 270.00 Call with Sheriff McCardell re seizure. | | | | 27.00 | | | | 260573 | |
| 317439 | Lawyer: BD 0.10 Hrs X 260.00 email from defendant regarding settlement | | | | 26.00 | | | | 260573 | |
| Feb 17/2016 | Lawyer: BD 0.10 Hrs X 260.00 email from client regarding settlement | | | | 26.00 | | | | 260573 | |
| 321978 | Lawyer: DS 0.10 Hrs X 480.00 reviewed electronic case filing notice and Order extending response time | | | | 48.00 | | | | 260573 | |
| Feb 19/2016 | Lawyer: BD 3.00 Hrs X 260.00 prepare email to JYAS outlining application of settlement funds to outstanding balance owed and attorney fees | | | | 780.00 | | | | 260573 | |
| 317766 | Lawyer: BD 0.20 Hrs X 260.00 response to email from counsel or JYAS regarding settlement and vehicles outside of 180 day period | | | | 52.00 | | | | 260573 | |
| Feb 19/2016 | Lawyer: BD 0.10 Hrs X 260.00 email status update to client | | | | 26.00 | | | | 260573 | |
| 321980 | Expense Recovery Other professionals Fee for Service of Complaint 1 @ 50.00 | X9378 | | 50.00 | | | | | 260573 | |
| Feb 23/2016 | Expense Recovery Other professionals Fee for Service of Order 1 @ 70.00 | X9378 | | 70.00 | | | | | 260573 | |
| 318887 | Lawyer: BD 0.10 Hrs X 260.00 Email from counsel for JYAS regarding settlement | | | | 26.00 | | | | 260573 | |
| Feb 29/2016 | Lawyer: BD 0.10 Hrs X 260.00 email response regarding repossession | | | | 26.00 | | | | 260573 | |
| 321981 | Lawyer: BD 0.50 Hrs X 260.00 Receipt and fill out forms from U.S. Marshal's to prepare for | | | | 130.00 | | | | 260573 | |

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|-------------|---|-------|---------------------|-------|----------------------------|--------|-----|-------|-------|---------|
| Entry # | Explanation | Rec# | Rcpt# | Disbs | Fees | Inv# | Acc | Rcpt# | Disbs | Balance |
| Feb 29/2016 | seizure | | | | | | | | | |
| 324255 | Lawyer: BD 0.10 Hrs X 260.00 | | | | 26.00 | 260573 | | | | |
| | phone call to U.S. Marshal's | | | | | | | | | |
| Mar 1/2016 | Lawyer: BD 0.20 Hrs X 260.00 | | | | 52.00 | 26212 | | | | |
| 322359 | e-mail to client regarding inspection of vehicles | | | | | | | | | |
| Mar 1/2016 | Billing on Invoice 260573 | | | | | | | | | |
| 324258 | FEES 5613.00 | | | 0.00 | | 260573 | | | | |
| | DISBS 171.85 | | | | | | | | | |
| Mar 2/2016 | Lawyer: BD 0.60 Hrs X 260.00 | | | | 156.00 | 26212 | | | | |
| 322362 | review and analysis of accounting from client | | | | | | | | | |
| | regarding status of collateral | | | | | | | | | |
| Mar 2/2016 | Lawyer: BD 0.50 Hrs X 260.00 | | | | 130.00 | 26212 | | | | |
| 322364 | review prior court orders regarding restriction on sales and list of specific stock numbers | | | | | | | | | |
| Mar 3/2016 | Lawyer: BD 0.20 Hrs X 260.00 | | | | 52.00 | 26212 | | | | |
| 322367 | compare audit to stock numbers identified in prior settlement emails with JYAS's counsel to determine inconsistencies | | | | | | | | | |
| Mar 3/2016 | Lawyer: BD 0.20 Hrs X 260.00 | | | | 52.00 | 26212 | | | | |
| 322368 | e-mail to client with strategy | | | | | | | | | |
| Mar 4/2016 | Lawyer: BD 0.50 Hrs X 260.00 | | | | 130.00 | 26212 | | | | |
| 319843 | Draft and filed motion for clerks entry of default and prepared default judgment | | | | | | | | | |
| Mar 4/2016 | Lawyer: DS 0.10 Hrs X 480.00 | | | | 48.00 | 26212 | | | | |
| 319868 | reviewed electronic case filing notice and Motion for Entry of Default against J. Yurkovich | | | | | | | | | |
| Mar 8/2016 | Lawyer: BD 0.20 Hrs X 260.00 | | | | 52.00 | 26212 | | | | |
| 322372 | draft and file request for clerk's entry of default judgment | | | | | | | | | |
| Mar 10/2016 | Lawyer: DS 0.20 Hrs X 480.00 | | | | 96.00 | 26212 | | | | |
| 323726 | reviewed electronic case filing notice and Notice of denial of Motion for Default Judgment because of inclusion of attorney's fees (.1); office conference with B. Danek re same (.1) | | | | | | | | | |
| Mar 21/2016 | Lawyer: MP 0.50 Hrs X 150.00 | | | | 75.00 | 26212 | | | | |
| 322001 | Redact vehicle registration documentation for production. | | | | | | | | | |
| Apr 1/2016 | Billing on Invoice 26212 | | | | | | | | | |
| 323731 | FEES 843.00 | | | 0.00 | | 26212 | | | | |
| Apr 11/2016 | Expense Recovery | | | | | | | | | |
| 324314 | Court fees (Ledes) 11 @ 0.10 | X9489 | | 1.10 | | 26373 | | | | |
| Apr 29/2016 | Lawyer: BD 0.10 Hrs X 260.00 | | | | 26.00 | 26373 | | | | |
| 326952 | Receipt and review order to show cause for lack of activity | | | | | | | | | |
| Apr 29/2016 | Lawyer: BD 0.20 Hrs X 260.00 | | | | 52.00 | 26373 | | | | |
| 326953 | E-mail to client regarding show cause and request for authority to file motion for default judgment | | | | | | | | | |
| May 1/2016 | Billing on Invoice 26373 | | | | | | | | | |
| 327477 | FEES 78.00 | | | 0.00 | | 26373 | | | | |
| | DISBS 1.10 | | | | | | | | | |
| May 2/2016 | Lawyer: DS 0.10 Hrs X 480.00 | | | | 48.00 | | | | | |
| 326929 | reviewed electronic case filing notice and Order to Show Cause for Failure to Prosecute | | | | | | | | | |
| May 2/2016 | Lawyer: DS 0.10 Hrs X 480.00 | | | | 48.00 | | | | | |
| 326930 | office conference with B. Danek re status | | | | | | | | | |
| May 2/2016 | Lawyer: DS 0.10 Hrs X 480.00 | | | | 48.00 | | | | | |
| 326931 | drafted e-mail correspondence to C. Trapp re need to move for default judgment | | | | | | | | | |
| May 2/2016 | Lawyer: DS 0.10 Hrs X 480.00 | | | | 48.00 | | | | | |
| 326932 | telephone call to W. Barkholz, Judge O'Meara's Case Manager, re Order | | | | | | | | | |
| May 4/2016 | Lawyer: BD 1.70 Hrs X 260.00 | | | | 442.00 | | | | | |
| 327698 | draft motion, brief in support, affidavit in support, and proposed order for default judgment | | | | | | | | | |
| May 5/2016 | Lawyer: BD 0.70 Hrs X 260.00 | | | | 182.00 | | | | | |
| 327816 | revise and edit motion for default judgment and affidavit in support to include updated attorney fees and receivables report | | | | | | | | | |

|————— UNBILLED —————|————— BILLED —————|————— BALANCES —————|

| Date | Received From/Paid To | Chq# | ----- General ----- | Bld | ----- Trust Activity ----- | | | | | |
|-------------|--|------|---------------------|-------|----------------------------|--------|-----|-------|-------|------------------|
| Entry # | Explanation | Rec# | Rcpt# | Disbs | Fees | Inv# | Acc | Rcpt# | Disbs | Balance |
| 200330 | NextGear Capital, Inc. | | | | | | | | | |
| 200330-0002 | Bankruptcy re John Yurkovich Auto Sales | | | | | | | | | Resp Lawyer: DNS |
| Feb 29/2016 | Lawyer: DS 1.20 Hrs X 480.00 | | | | | | | | | |
| 321972 | reviewed e-mail correspondence from S. Landreth (.1); reviewed e-mail correspondence from B. Danek (.1); telephone conference with E. Dunn, bankruptcy counsel for JYAS (.2); accessed PACER and pulled petition and related filings (.3); drafted e-mail correspondence to S. Landreth, B. Danek, and M. Wilkins re same (.3); drafted e-mail correspondence to E. Dunn re same (.1); reviewed e-mail correspondence from S. Landreth (.1); exchanged e-mail correspondence with M. Wilkins re moving for relief from stay (.1) | | | | 576.00 | 260572 | | | | |
| Feb 29/2016 | Lawyer: MW 0.30 Hrs X 530.00 | | | | | | | | | |
| 321986 | Review bankruptcy documents, | | | | 159.00 | 260572 | | | | |
| Feb 29/2016 | Lawyer: MW 0.10 Hrs X 530.00 | | | | | | | | | |
| 321987 | Conference with B. Danek regarding matter background, proceeding against owner individually. | | | | 53.00 | 260572 | | | | |
| Mar 1/2016 | Billing on Invoice 260572 | | | | | | | | | |
| 322270 | FEES 788.00 | | | | 0.00 | 260572 | | | | |
| Mar 1/2016 | Lawyer: BD 0.30 Hrs X 260.00 | | | | | | | | | |
| 322360 | phone call with client and M. Wilkins regarding bankruptcy and strategy | | | | 78.00 | 26211 | | | | |
| Mar 1/2016 | Lawyer: BD 0.30 Hrs X 260.00 | | | | | | | | | |
| 322361 | phone call with JYAS's bankruptcy counsel | | | | 78.00 | 26211 | | | | |
| Mar 1/2016 | Lawyer: MW 0.50 Hrs X 530.00 | | | | | | | | | |
| 322675 | Conference with B. Danek regarding Yurkovich bankruptcy, background and strategy going forward. | | | | 265.00 | 26211 | | | | |
| Mar 1/2016 | Lawyer: MW 0.50 Hrs X 530.00 | | | | | | | | | |
| 322676 | Prepare for and participate in status and strategy call with client. | | | | 265.00 | 26211 | | | | |
| Mar 1/2016 | Lawyer: MW 0.20 Hrs X 530.00 | | | | | | | | | |
| 322679 | Conference with B. Danek regarding pursuing Yurkovich individually, apart from bankruptcy proceeding. | | | | 106.00 | 26211 | | | | |
| Mar 1/2016 | Lawyer: MW 0.40 Hrs X 530.00 | | | | | | | | | |
| 322680 | Review underlying pleadings in District Court case. | | | | 212.00 | 26211 | | | | |
| Mar 1/2016 | Lawyer: MW 0.40 Hrs X 530.00 | | | | | | | | | |
| 322686 | Prepare for and telephone to Yurkovich counsel regarding case background, status and regarding NextGear inspection of collateral inventory. | | | | 212.00 | 26211 | | | | |
| Mar 1/2016 | Lawyer: MW 0.20 Hrs X 530.00 | | | | | | | | | |
| 322687 | Correspondence to debtor's counsel regarding cash collateral use and inspection. | | | | 106.00 | 26211 | | | | |
| Mar 1/2016 | Lawyer: DS 0.10 Hrs X 480.00 | | | | | | | | | |
| 323251 | exchanged e-mails M. Wilkins and B. Danek re Yurkovich bankruptcy filing and stay in lawsuit | | | | 48.00 | 26211 | | | | |
| Mar 1/2016 | Lawyer: BD 0.20 Hrs X 260.00 | | | | | | | | | |
| 323725 | meeting with M. Wilkins to discuss litigation strategy in light of bankruptcy filing | | | | 52.00 | 26211 | | | | |
| Mar 2/2016 | Lawyer: BD 0.20 Hrs X 260.00 | | | | | | | | | |
| 322363 | phone call from bankruptcy counsel regarding ability to sell vehicles | | | | 52.00 | 26211 | | | | |
| Mar 2/2016 | Lawyer: BD 0.20 Hrs X 260.00 | | | | | | | | | |
| 322365 | correspondence from and response to counsel for JYAS regarding sale of vehicle | | | | 52.00 | 26211 | | | | |
| Mar 2/2016 | Lawyer: BD 0.60 Hrs X 260.00 | | | | | | | | | |
| 322366 | legal research for case law regarding bankruptcy stay and vacating district court order | | | | 156.00 | 26211 | | | | |
| Mar 2/2016 | Lawyer: MW 0.30 Hrs X 530.00 | | | | | | | | | |
| 322690 | Correspondence from client regarding and discussions with B. Danek regarding vehicles soled out of trust. | | | | 159.00 | 26211 | | | | |

M ECF No. 19-3 PageID.150

ALL DATES

General ---

| Date | Received From/Paid To | Chq# | ----- General ----- | Bld | ----- Trust Activity ----- | | | | | |
|-------------|---|------|---------------------|-------|----------------------------|------|-------|-------|-------|---------|
| Entry # | Explanation | Rec# | Rcpt# | Disbs | Fees | Inv# | Acc | Rcpt# | Disbs | Balance |
| 323723 | receipt and review motion for use of collateral (.2); discuss response to motion with M. Wilkins (.1) | | | | 78.00 | | 26211 | | | |
| Mar 17/2016 | Lawyer: BD 0.20 Hrs X 260.00 | | | | | | | | | |
| 322389 | phone call with client for strategy regarding cash collateral | | | | 52.00 | | 26211 | | | |
| Mar 17/2016 | Lawyer: BD 0.20 Hrs X 260.00 | | | | | | | | | |
| 322390 | draft objection to file in response to motion for use of pre-petition cash collateral | | | | 52.00 | | 26211 | | | |
| Mar 17/2016 | Lawyer: MW 0.50 Hrs X 530.00 | | | | | | | | | |
| 322893 | Prepare for and strategy call with B. Danek and client. | | | | 265.00 | | 26211 | | | |
| Mar 20/2016 | Lawyer: BD 0.10 Hrs X 260.00 | | | | | | | | | |
| 322391 | receipt and review of order for hearing on motion for use of cash collateral | | | | 26.00 | | 26211 | | | |
| Mar 20/2016 | Lawyer: BD 1.90 Hrs X 260.00 | | | | | | | | | |
| 322392 | draft response to motion | | | | 494.00 | | 26211 | | | |
| Mar 21/2016 | Lawyer: BD 1.30 Hrs X 260.00 | | | | | | | | | |
| 322393 | revise and edit response to motion for use of cash collateral | | | | 338.00 | | 26211 | | | |
| Mar 21/2016 | Lawyer: MW 1.20 Hrs X 530.00 | | | | | | | | | |
| 322530 | Review, revise and draft objection to motion to use cash collateral. | | | | 636.00 | | 26211 | | | |
| Mar 21/2016 | Lawyer: MW 0.50 Hrs X 530.00 | | | | | | | | | |
| 322531 | Correspondence with client regarding and discuss strategic options with B. Danek. | | | | 265.00 | | 26211 | | | |
| Mar 22/2016 | Lawyer: BD 2.00 Hrs X 260.00 | | | | | | | | | |
| 322394 | draft motion for appointment of chapter 11 trustee | | | | 520.00 | | 26211 | | | |
| Mar 22/2016 | Lawyer: BD 0.50 Hrs X 260.00 | | | | | | | | | |
| 322395 | revise and edit declaration of M. Dickson in support | | | | 130.00 | | 26211 | | | |
| Mar 22/2016 | Lawyer: BD 0.30 Hrs X 260.00 | | | | | | | | | |
| 322396 | meet with M. Dickson for execution of declaration | | | | 78.00 | | 26211 | | | |
| Mar 22/2016 | Lawyer: MW 1.70 Hrs X 530.00 | | | | | | | | | |
| 322537 | Review, revise and draft objection to motion to use cash collateral and have filed. | | | | 901.00 | | 26211 | | | |
| Mar 22/2016 | Lawyer: MW 1.00 Hrs X 530.00 | | | | | | | | | |
| 322538 | Review, revise and draft Motion to Appoint Chapter 11 Trustee. | | | | 530.00 | | 26211 | | | |
| Mar 22/2016 | Lawyer: MW 1.80 Hrs X 530.00 | | | | | | | | | |
| 322539 | Prepare for contested hearing on motion to use cash collateral and motion to appoint Chapter 11 Trustee. | | | | 954.00 | | 26211 | | | |
| Mar 23/2016 | Lawyer: BD 0.90 Hrs X 260.00 | | | | | | | | | |
| 322397 | prepare for hearing on motion for use of cash collateral | | | | 234.00 | | 26211 | | | |
| Mar 23/2016 | Lawyer: MW 3.00 Hrs X 530.00 | | | | | | | | | |
| 322556 | Prepare for and attend hearing on contested collateral motion -- negotiate resolution with debtor and place on record. | | | | 1590.00 | | 26211 | | | |
| Mar 23/2016 | Lawyer: MW 1.50 Hrs X 530.00 | | | | | | | | | |
| 322557 | Review and revise Cash Collateral Order to reflect negotiated changes and changes requested by Court. | | | | 795.00 | | 26211 | | | |
| Mar 23/2016 | Lawyer: BD 2.50 Hrs X 260.00 | | | | | | | | | |
| 323724 | attend hearing on motion for use of cash collateral | | | | 650.00 | | 26211 | | | |
| Mar 24/2016 | Lawyer: BD 0.60 Hrs X 260.00 | | | | | | | | | |
| 322399 | revise and edit proposed order for use of cash collateral | | | | 156.00 | | 26211 | | | |
| Mar 25/2016 | Lawyer: MW 0.20 Hrs X 530.00 | | | | | | | | | |
| 322572 | Review draft revisions to cash collateral order for client and approval by client. | | | | 106.00 | | 26211 | | | |
| Mar 28/2016 | Lawyer: MW 0.20 Hrs X 530.00 | | | | | | | | | |
| 322584 | Conference with B. Danek regarding cash collateral order, attending first meeting of creditors. | | | | 106.00 | | 26211 | | | |
| Mar 29/2016 | Lawyer: MW 0.30 Hrs X 530.00 | | | | | | | | | |
| 322592 | Conference with B. Danek regarding status of cash collateral order and advising debtor that client does not consent, absent entry of order. | | | | 159.00 | | 26211 | | | |
| Mar 29/2016 | Lawyer: MW 0.20 Hrs X 530.00 | | | | | | | | | |
| 322593 | Conference with B. Danek | | | | 106.00 | | 26211 | | | |

| Date | Received From/Paid To | Chq# | General | | Bld | Trust Activity | | | | |
|-------------|--|-------|---------|-------|--------|----------------|-------|-------|-------|---------|
| Entry # | Explanation | Rec# | Rcpt | Disbs | Fees | Inv# | Acc | Rcpt | Disbs | Balance |
| | regarding Section 341 meeting -- check with client on attendance. | | | | | | | | | |
| Apr 1/2016 | Billing on Invoice 26211 | | | | | | | | | |
| 323728 | FEES 13705.00 | | | 0.00 | | | | 26211 | | |
| Apr 4/2016 | Lawyer: MW 0.30 Hrs X 530.00 | | | | | | | | | |
| 326050 | Correspondence from and to B. Danek regarding cash collateral order, UST concerns over Chapter 5 recoveries carve-out. | | | | 159.00 | | 26371 | | | |
| Apr 7/2016 | Lawyer: MW 0.30 Hrs X 530.00 | | | | | | | | | |
| 327376 | Review Debtor's motion to assume Credit Acceptance executory contract. | | | | 159.00 | | 26371 | | | |
| Apr 7/2016 | Lawyer: MW 0.20 Hrs X 530.00 | | | | | | | | | |
| 327377 | Correspondence with B. Danek regarding status, motion. | | | | 106.00 | | 26371 | | | |
| Apr 8/2016 | Lawyer: BD 0.20 Hrs X 260.00 | | | | | | | | | |
| 327022 | Phone call with Debtor's counsel regarding changes to cash collateral order and repossession | | | | 52.00 | | 26371 | | | |
| Apr 8/2016 | Lawyer: BD 0.60 Hrs X 260.00 | | | | | | | | | |
| 327023 | Review and analysis of Debtor's motion to assume executory contract | | | | 156.00 | | 26371 | | | |
| Apr 11/2016 | Expense Recovery | | | | | | | | | |
| 324326 | Court fees (Ledes) 89 @ 0.10 | X9489 | | 8.90 | | | | 26371 | | |
| Apr 13/2016 | Lawyer: BD 0.30 Hrs X 260.00 | | | | | | | | | |
| 324567 | Phone cal with Debtor's counsel to discuss cash collateral and dealer license appeal | | | | 78.00 | | 26371 | | | |
| Apr 13/2016 | Lawyer: BD 0.30 Hrs X 260.00 | | | | | | | | | |
| 324575 | Revise and edit proposed order for use of cash collateral | | | | 78.00 | | 26371 | | | |
| Apr 20/2016 | Lawyer: BD 0.30 Hrs X 260.00 | | | | | | | | | |
| 325420 | Phone call from Debtor's counsel regarding seizure of vehicles and entry of cash collateral order | | | | 78.00 | | 26371 | | | |
| Apr 20/2016 | Lawyer: MW 0.10 Hrs X 530.00 | | | | | | | | | |
| 326439 | Correspondence with B. Danek regarding current status of vehicles. | | | | 53.00 | | 26371 | | | |
| Apr 20/2016 | Lawyer: MW 0.20 Hrs X 530.00 | | | | | | | | | |
| 326440 | Advise client need stay relief if vehicles are going to be repossessed. | | | | 106.00 | | 26371 | | | |
| Apr 26/2016 | Lawyer: BD 0.50 Hrs X 260.00 | | | | | | | | | |
| 326971 | Draft and revise proposed order for use of cash collateral | | | | 130.00 | | 26371 | | | |
| Apr 28/2016 | Lawyer: BD 0.20 Hrs X 260.00 | | | | | | | | | |
| 326947 | Phone call and e-mail to Debtor's counsel for status of trustee review of cash collateral order | | | | 52.00 | | 26371 | | | |
| May 1/2016 | Billing on Invoice 26371 | | | | | | | | | |
| 327475 | FEES 1207.00 | | | 0.00 | | | | 26371 | | |
| | DISBS 8.90 | | | | | | | | | |
| May 3/2016 | Lawyer: BD 0.20 Hrs X 260.00 | | | | | | | | | |
| 327602 | Prepared updated status report on Serengeti | | | | 52.00 | | | | | |

| TOTALS PERIOD | UNBILLED | | | | BILLED | | | | BALANCES | | |
|------------------|----------|---------|--------|---------|----------|--------|-------|------------|----------|-------|--|
| | CHE | + RECOV | + FEES | = TOTAL | DISBS | + FEES | + TAX | - RECEIPTS | = A/R | TRUST | |
| | 0.00 | 0.00 | 52.00 | 8.90 | 15700.00 | 0.00 | 0.00 | 15708.90 | 0.00 | | |

REPORT SELECTIONS - Client Ledger

Layout Template Default
Advanced Search Filter None
Requested by Consuela
Finished Thursday, May 05, 2016 at 10:54:42 AM
Ver 14.0 (14.0.20140923)
Matters 200330-0002
Clients All
Major Clients All
Client Intro Lawyer All
Matter Intro Lawyer All
Responsible Lawyer All
Assigned Lawyer All
Type of Law All
Select From Active, Inactive Matters
Matters Sort by Default
New Page for Each Lawyer No
New Page for Each Matter No
No Activity Date Dec/31/2199
Firm Totals Only No
Totals Only No
Entries Shown - Billed Only No

Jan/ 1/2016 To May/31/2016

| Date | Paid To | Source Matter | Client Name | Ref# | G/L Acct | Amount |
|-------------|--|---------------|-------------|-------------------|----------------------------|--------|
| Entry# | Explanation | | | | | |
| Jan/28/2016 | Expense Recovery | CER | 200330-0001 | NextGear Capital, | X9311 Expenses | 400.00 |
| 314986 | Case Filing Fee | | | | | |
| | Total for Jan/28/2016 : | 400.00 | | | | |
| Feb/11/2016 | Expense Recovery | CER | 200330-0001 | NextGear Capital, | X9369 Expenses | 49.45 |
| 318886 | Local Ledes Travel 86 @ 0.575 | | | | | |
| Feb/11/2016 | Expense Recovery | CER | 200330-0001 | NextGear Capital, | X9369 Expenses | 2.40 |
| 318889 | Local Ledes Travel 1 @ 2.40 | | | | | |
| | Total for Feb/11/2016 : | 51.85 | | | | |
| Feb/23/2016 | Expense Recovery | CER | 200330-0001 | NextGear Capital, | X9378 Expenses | 50.00 |
| 318887 | Other professionals Fee for Service of Compl | | | | | |
| Feb/23/2016 | Expense Recovery | CER | 200330-0001 | NextGear Capital, | X9378 Expenses | 70.00 |
| 318888 | Other professionals Fee for Service of Order | | | | | |
| | Total for Feb/23/2016 : | 120.00 | | | | |
| Apr/11/2016 | Expense Recovery | CER | 200330-0001 | NextGear Capital, | X9489 Client Disb Clearing | 1.10 |
| 324314 | Court fees (Ledes) 11 @ 0.10 | | | | | |
| | Total for Apr/11/2016 : | 1.10 | | | | |

REPORT SELECTIONS - Client Costs Journal

Layout Template: All
 Requested by: Consuela
 Finished: Wednesday, May 04, 2016 at 10:03:26 AM
 Date Range: Jan/ 1/2016 To May/31/2016
 Matters: 200330-0001
 Clients:
 Major Clients: All Matter Intro Lawyer: All
 Responsible Lawyer: All Client Intro Lawyer: All
 Assigned Lawyer: All Type of Law: All
 Sort by Resp Lawyer: No New Page for Each Lawyer: No
 G/L Account: All G/L Accounts Include Exp. Recoveries: Yes
 Ref#: All Checks Include Accounts Payable Entries: Yes
 G/L Summary Only: No Include General Check Allocations: No
 Display in Order Entered: No Show User Name: No
 Corrected Entries: Not Included Summary by Resp Lawyer: No
 Select From: Active, Inactive, Archived Matters
 Explanations Codes: All
 Ver: 14.0 (14.0.20140923)
 Printed from: Register

Client Costs Journal

Jan/ 1/2016 To May/31/2016

| Date | Paid To | Source Matter | Client Name | Ref# G/L Acct | Amount |
|-------------|------------------------------|---------------|-------------|-------------------|----------------------------|
| Entry# | Explanation | | | | |
| Apr/11/2016 | Expense Recovery | CER | 200330-0002 | NextGear Capital, | X9489 Client Disb Clearing |
| 324326 | Court fees (Ledes) 89 @ 0.10 | | | | 8.90 |
| | Total for Apr/11/2016 : | | | | 8.90 |

REPORT SELECTIONS - Client Costs Journal

Layout Template: All
Requested by: Consuela
Finished: Wednesday, May 04, 2016 at 10:03:41 AM
Date Range: Jan/ 1/2016 To May/31/2016
Matters: 200330-0002
Clients:
Major Clients: All Matter Intro Lawyer: All
Responsible Lawyer: All Client Intro Lawyer: All
Assigned Lawyer: All Type of Law: All
Sort by Resp Lawyer: No New Page for Each Lawyer: No
G/L Account: All G/L Accounts Include Exp. Recoveries: Yes
Ref#: All Checks Include Accounts Payable Entries: Yes
G/L Summary Only: No Include General Check Allocations: No
Display in Order Entered: No Show User Name: No
Corrected Entries: Not Included Summary by Resp Lawyer: No
Select From: Active, Inactive, Archived Matters
Explanation Codes: All
Jer: 14.0 (14.0.20140923)
Printed from: Register